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December 17, 2018

Honorable Denis R. Hurley  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Cause No.16-CR-584 (DRH); United States of America v. Hema Patel

Dear Judge Hurley:

I represent First Financial Credit Union ("FFCU"), an interested third-party in the above-referenced matter, under the Court's approval of Motion to Admit Counsel *pro hac vice* (Doc 137). FFCU is a federally chartered credit union which as of December 3, 2018, holds the secured interest in certain property and bank account listed in the Forfeiture Order (Doc 101, item (c) on page 1 and item (k) on page 2).

FFCU as of December 3, 2018, is the successor in interest to Petitioner California Credit Union ("CCU") as to the Verified Petition (Doc 113) filed herein July 24, 2018.

The United States of America, through the Office of the United States Attorney, does not oppose this substitution.

The "Subject Property," as to which the CCU Petition relates is referred to as the "Texas Inn and Suites", (the real property and premises together with its respective buildings appurtenances, improvements, fixtures, attachments, easements and furnishings, located at 118 North Expressway 77, Raymondville, Texas 78580 and any and all funds on deposit in International Bank of Commerce account number ending in 9501 held in the name of Neepa Vina [sic] Investments, LLC d/b/a Texas Inn and Suites, and all proceeds traceable thereto) Doc 113.)

At the CCU Petition filing date (July 24, 2018), CCU was the lienholder and beneficiary under the 2007 Deed of Trust (Doc 113) which secured payment of a 2007 loan to finance the Texas Inn property. FFCU owned 99% of that loan since origination

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via a contractual participation agreement with CCU. CCU retained 1% and the ownership of the loan.

On December 3, 2018, FFCU completed acquisition of CCU's 1% interest in the loan securing the Subject Property and the ownership title to the loan documents as the successor lender. FFCU's acquisition of ownership of the loan was completed by the recording of the assignment of deed of trust in Willacy County Texas' Clerk's Office on December 3, 2018. Copies of the Loan Purchase Agreement and the recorded Assignment of Deed of Trust are attached to the enclosed proposed Notice. As of December 3, 2018, FFCU is the successor in interest as to all right, title and interest in the CCU loan on the Subject Property and is the replacement real party in interest in the CCU Verified Petition.

The CCU Verified Petition was properly filed within the 30 day requirement 21 U.S.C. § 853(n)(2), and continues to be correct as to all substantive elements of the Petition. There is no change to such Petition, except to document the substitution of FFCU in replacement of CCU as the successor real party in interest.

FFCU respectfully requests to this Court allow the filing of the enclosed Verified Notice of Substitution of Petitioner as to the CCU Verified Petition (Doc 113).

Respectfully Submitted,



Gordon S. Little

Enclosure: Verified Notice of Substitution of Petitioner

C w/enclosure: Robert Schumacher, Esq., Assistant U.S. Attorney  
(via email)